# Labaton **Sucharow**

Serena P. Hallowell

Partner 212 907 0815 direct 212 907 0700 main 212 883 7515 fax shallowell@labaton.com

New York Office 140 Broadway New York, NY 10005

June 18, 2020

#### VIA ECF

The Honorable Michael A. Shipp, U.S.D.J. U.S. District Court for the District of New Jersey Clarkson S. Fisher Building and U.S. Courthouse 402 East State Street Trenton, New Jersey 08608

RE: The Public Employees' Retirement System of Mississippi v. Valeant Pharmaceuticals International Inc., et al, No. 17-cv-07625 (MAS) (LHG); Office of the Treasurer as Trustee for the Connecticut Retirement Plans and Trust Funds v. Valeant Pharmaceuticals International Inc., et al, No. 19-cv-18473 (MAS) (LHG); Delaware Public Employees' Retirement System v. Valeant Pharmaceuticals International Inc., et al, No. 19-cv-18475 (MAS) (LHG)

Dear Judge Shipp:

On behalf of plaintiffs in the above-referenced actions, we respectfully submit the enclosed Stipulation of Dismissal with counsel for defendants Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, and Tanya Carro, dismissing the referenced actions with prejudice.

Respectfully submitted,

Serena P. Hallowell

Enclosure

cc: All Counsel of Record (via ECF)

# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

IN RE VALEANT PHARMACEUTICALS INTERNATIONAL, INC. SECURITIES LITIGATION

Civil Action No. 15-cv-07658-MAS-LHG

Judge Michael A. Shipp

Magistrate Judge Lois H. Goodman

Special Master, Judge Dennis M. Cavanaugh, Ret.

THIS DOCUMENT RELATES TO:

3:17-cv-07625 3:19-cv-18473 3:19-cv-18475

#### STIPULATION OF DISMISSAL WITH PREJUDICE

In accordance with Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Office of the Treasurer as Trustee for the State of Connecticut Retirement Plans and Trust Funds, Public Employees' Retirement System of Mississippi, and Delaware Public Employees' Retirement System, and Defendants Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, and Tanya Carro, by and through their respective counsel of record, hereby stipulate to dismiss the above-captioned actions with prejudice. Each party will bear its own attorneys' fees and costs.

Dated: June 18, 2020

# MCCARTER & ENGLISH, LLP

/s/ Richard Hernandez Richard Hernandez Four Gateway Center 100 Mulberry Street Newark, New Jersey 07102 Telephone: (973) 848-8615 Fax: (973) 297-6615

Local counsel for Valeant Pharmaceuticals International, Inc., Robert L. Rosiello, and Tanya Carro

#### LABATON SUCHAROW LLP

/s/ Serena P. Hallowell Serena P. Hallowell SHallowell@labaton.com 140 Broadway New York, NY 10005 Telephone: (212) 907-0815 Fax: (212) 883-7515

Attorney for the Plaintiffs Office of the Treasurer as Trustee for the State of Connecticut Retirement Plans and Trust

### SIMPSON THACHER & BARTLETT LLP

/s/ Craig S. Waldman

Paul C. Curnin PCurnin@stblaw.com

Craig S. Waldman

CWaldman@stblaw.com 425 Lexington Avenue New York, NY 10017

Telephone: (212) 455-2000

Fax: (212) 455-2502

Attorneys for Valeant Pharmaceuticals International, Inc. and Robert L. Rosiello

#### **DEBEVOISE & PLIMPTON LLP**

/s/ Matthew Petrozziello

Matthew Petrozziello Bruce E. Yannett 919 Third Avenue New York, NY 10022

Telephone: (212) 909-6000

Fax: (212) 909-6836

Jonathan R. Tuttle Ada F. Johnson 801 Pennsylvania Avenue, NW Washington, D.C. 20004 Telephone: (202) 383-8000 Fax: (202) 383-8118

Attorneys for J. Michael Pearson

#### **COOLEY LLP**

/s/ William J. Schwartz

William J. Schwartz Sarah Lightdale 55 Hudson Yards

New York, NY 10001

Telephone: (212) 479-6000

Fax: (212) 479-6275

Attorneys for Tanya Carro

Funds, Public Employees' Retirement System of Mississippi, and Delaware Public Employees' Retirement System

#### KASOWITZ BENSON TORRES LLP

/s/ Stephen W. Tountas

Stephen W. Tountas STountas@kasowitz.com

1633 Broadway

New York, NY 10019

Telephone: (212) 506-1739

Fax: (973) 643-2030

Attorney for the Plaintiff Public Employees'

Retirement System of Mississippi

# WINSTON & STRAWN LLP

/s/ Benjamin Sokoly
Benjamin Sokoly
200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700

Fax: (212) 294-4700

Robert Y. Sperling Joseph L. Motto 35 W. Wacker Drive Chicago, IL 60601

Telephone: (312) 558-5600

Fax: (312) 558-5700

Attorneys for Howard B. Schiller

SO ORDERED this	day of	, 2020
Honorable:		